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Summary Progress Report

for complying with the



Gray Davis, Governor State of California

Winston H. Hickox, Secretary California Environmental Protection Agency

Edwin F. Lowry, Director
Department of Toxic Substances Control

California Environmental Protection Agency

Department of Toxic Substances Control

Office of Pollution Provention

Office of Pollution Prevention and Technology Development

Document Availability

Copies of the Summary Progress Report are available from the Office of Pollution Prevention and Technology Development (OPPTD) as noted below. The Summary Progress Report is also available from OPPTD's web site at http://www.dtsc.ca.gov/PollutionPrevention/index.html.

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Contacting OPPTD

If you have questions or comments regarding the Summary Progress Report, the Hazardous Waste Source Reduction and Management Review Act of 1989, the regulations, or the Source Reduction Unit, you may contact OPPTD by

MAIL Department of Toxic Substances Control
Office of Pollution Prevention and Technology Development HQ-25
Source Reduction Unit
P. O. Box 806
Sacramento, CA. 95812-0806

TELEPHONE 916.322.3670

FAX 916.327.4494

EMAIL Send your questions about completing the Summary Progress Report to sb14@dtsc.ca.gov.

Send requests for OPPTD publications listed in the section of this Compliance Checklist entitled "Further Information" to opptddoc@dtsc.ca.gov.

The Summary Progress Report

1.0 Background

The Hazardous Waste Source Reduction and Management Review Act of 1989, also known as SB 14, requires hazardous waste generators to consider source reduction as the preferred method of managing hazardous waste. SB 14 promotes source reduction over recycling, treatment, and disposal. Source reduction avoids the generation of hazardous wastes, as well as its associated management liabilities and adverse impacts to public health and the environment.

The Guidance Manual for Complying with the Hazardous Waste Source Reduction and Management Review Act of 1989 (2002 edition) explains SB 14 requirements for generators and is referenced throughout this document. Generators are strongly encouraged to obtain a copy of the Guidance Manual to determine if they are captured by SB 14 and to ensure that they satisfy all of the requirements. **The Summary Progress Report is one of the documents required by SB 14.**

SB 14 applies to generators that, by site, routinely generate through ongoing processes and operations, more than 12,000 kilograms of hazardous waste or 12 kilograms of extremely hazardous waste in a reporting year. Chapter 2 of the Guidance Manual explains the process of determining if a facility is captured under SB 14, defines terminology specific to SB 14, and lists waste streams that are exempted or otherwise excluded from SB 14 requirements. The current SB 14 reporting year is calendar year 2002.

2.0 SB 14 Reporting Requirements

Generators who are subject to SB 14 in reporting year 2002 are required to satisfy SB 14 reporting requirements by September 1, 2003. Generators subject to SB 14 must conduct a source reduction evaluation at their facility and prepare the three following documents:

- Source Reduction Evaluation Review and Plan (Plan) as described in Chapter 5 of the Guidance Manual;
- Hazardous Waste Management Performance Report (Performance Report) as described in Chapter 6 of the Guidance Manual; and
- Summary Progress Report (SPR) as described herein.

As explained in Chapter 4 of the Guidance Manual, facilities that are subject to SB 14 and meet the definition of a small business (California Government Code Section 11324) have the option to complete a Compliance Checklist in place of the Plan. In place of the Performance Report, a small business can use their most recent biennial generator report (BGR), as required by California Code of Regulations Section 66261.41

When preparing SB 14 documents, keep in mind that the SPR is a summary of the information contained in your Plan and Performance Report, or your Compliance Checklist. For this reason, the SPR should be prepared after the Plan and Performance Report, or the Compliance Checklist, have been completed.

3.0 Summary Progress Report (SPR)

SB 14 legislation mandated the preparation and submittal of the SPR starting September 1, 1999, and every four years thereafter. The submittal is done on DTSC Form 1262, as provided in this document. The form is also available on the DTSC website. This latest edition is a revision of the previous Form 1262. In this latest revision, the **requested information is the same as the previous edition** but the layout, organization, and instructions have changed significantly to simplify the form.

DTSC Form 1262 "Summary Progress Report" consists of Table 1 and Table 2. Generators should read all the instructions integrated into the latest SPR form very carefully before completing Tables 1 and 2. **All SB 14 generators, including small**

businesses, are required to prepare and submit the SPR to DTSC by September 1, 2003.

3.1 Completing the SPR

The SPR requires quantitative data and some narrative description. If you are a generator subject to SB 14, you are required to include this information in your SPR for the period 1998-2002. This is your opportunity to document your source reduction successes over the last four years or longer if information is available.

To accurately prepare the SPR, you will need to obtain information from your SB 14 Plan and Performance Report documents for the 1998 and 2002 reporting years. To help generators accurately complete the SPR, "SPR Tips" have

SPR

SPR Tips tell the generator where in their Plan and Performance Report to find data needed to complete specific sections in their SPR.

been added to Chapters 5 and 6 of the Guidance Manual (2002 edition).

Before completing your SPR, please note the following:

- If a generator was required to submit an SPR for 1998 and is also required to for 2002, the generator **must** provide all information requested in both Tables 1 and 2.
- If a generator was not required to submit an SPR for 1998, but is required to report for 2002, the generator **must** fill out only form items for 2002 and not for 1998. This generator is not required to complete the accomplishments portion (Section 24) of Table 2.

• If a generator was required to report only for 1998 and not for 2002, the generator is not subject to SB 14 and is **not** required to prepare and submit the SPR. Regardless, OPPTD requests that active generators complete and submit parts of Table 1 and Table 2 for 1998, as appropriate.

Table 1 of the SPR requests general information and total hazardous waste generation data for calendar years 1998 and 2002. Table 1 also requests a brief summary and comments of your organization's historical source reduction successes and waste management practices. Your comments can also include reuse, recycling, treatment, and disposal activities. If more space is needed for comments, please add a separate page to provide complete information. Since the information requested in Table 1 is for the entire facility, **Table 1 is only completed once for each site**.

Table 2, Section 24 addresses accomplishments by specific waste stream, as achieved over the last four year period 1999-2002. This information can be obtained from your 2002 Performance Report. Table 2, Section 25 addresses projections by specific waste stream covering the next four year period 2003-2006. Use your 2002 Plan to obtain information for Section 25. Since the information required for Table 2 is waste stream-specific, a separate Table 2 must be completed for each major waste stream and for each minor waste stream for which a source reduction measure was selected.

Note that SPR Form 1262 is also to be used to report extremely hazardous waste. If you have identified extremely hazardous waste in your 1998 or 2002 source reduction documents, please complete a separate copy of Form 1262 for your extremely hazardous waste streams and indicate their description in Table 2, Section 21.

Also note that the SPR is not confidential and OPPTD will make all SPR forms available to the public upon request. If a trade secret issue is involved, follow the procedure discussed in Chapter 8 of the Guidance Manual.

3.2 Solutions to Common SPR Mistakes

September 1, 1999 was the first time that generators subject to SB 14 were required to prepare and submit an SPR to DTSC. Following that deadline, OPPTD evaluated all submitted SPRs for accuracy and completeness. Mistakes were most frequently found in two specific areas.

1) Differentiating hazardous waste streams that are pretreated on site, and then discharged, from those that are not.

The following changes have been made to the Guidance Manual and to Form 1262 to alleviate the confusion associated with the waste stream categories. Hazardous waste streams that are pretreated on site, then subsequently discharged via the sewer system to a publicly owned treatment works or to a receiving water under a National Pollution Discharge Elimination System (NPDES) permit, are now referred to as Category A wastes in the Guidance Manual. This type of waste stream was formerly called "aqueous waste." All other hazardous waste streams subject to SB 14, which were formerly called "nonaqueous wastes", are now referred to as Category B wastes. These terminology changes are relevant to Sections 15, 16, and 23 of Revised SPR Form 1262.

2) Estimating source reduction achieved (i.e., the amount of waste reduced due to implementing source reduction).

More significant is the uncertainty surrounding what to report for "source reduction achieved." The last item in Table 2, Section 24 of the revised SPR Form asks the generator to **estimate the quantity of waste reduced annually as a result of implementing a source reduction procedure**. No single method of estimating this value is appropriate for all facilities or all waste streams. In Chapter 6 of the Guidance Manual (2002 edition), there is a gray box titled "Quantify Source Reduction Achieved," which provides examples that a generator might consider using to estimate their annual waste reduction, in pounds per year, due to implementing one or more source reduction measures on a specific waste stream.

4.0 Send completed SPR to OPPTD

By the September 1, 2003 submittal deadline, please mail your completed Summary Progress Report Form 1262 for the 2002 reporting year to:

Office of Pollution Prevention and Technology Development

Department of Toxic Substances Control

P.O. Box 806

Sacramento, California, 95812-0806

Attention: Summary Progress Report/Source Reduction Unit

The SPR also can be e-mailed directly to DTSC, at the email address spr@dtsc.ca.gov. An electronic version of the SPR may be available by Spring 2003.

After September 1, 2003, DTSC will undertake compliance review of all SPR forms received by that deadline date. DTSC will process and compile collected information into a database. The database will help OPPTD analyze statewide hazardous waste reduction trends. The database may be used to prepare fact sheets, industry specific assessment reports, and reports documenting the progress of California's generators towards reducing hazardous waste. DTSC will also use the collected information to estimate statewide hazardous waste source reduction progress. This information may also be used to report to the Legislature on statewide source reduction success.

5.0 Assistance and DTSC Publications

If you have questions regarding the SPR or the SB 14 program, please contact the Source Reduction Unit at (916) 322-3670. Inquiries can also be e-mailed to sb14@dtsc.ca.gov.

Contact OPPTD if you need to obtain additional copies of this Summary Progress Report publication No. 003. SPR form 1262 and supporting instructions are also incorporated into Chapter 7 of the Guidance Manual and in the Compliance Checklist (2002 edition). OPPTD will mail printed publications upon request. The publications are also available for you to print from the DTSC web site http://www.dtsc.ca.gov/PollutionPrevention/index.html.

SUMMARY PROGRESS REPORT

TABLE 1: GENERAL INFORMATION	Date
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A hazardous waste generator subject to SB 14, is <u>required to complete and submit Tables 1 and 2</u> to the Department of Toxic Substances Control by September 1, 2003. <u>The generator is to submit only one Table 1.</u> <u>The generator may need to submit more than one Table 2,</u> one for each reportable waste stream as stated thereon.

See Summary Progress Report publication or SB 14 Guidance Manual Chapter 7, for assistance.

(1) NAME OF GENERATOR, FACILITY, or BUSINESS					
(2) EPA ID NO.	(3) SIC CODE (provide SIC or NAICS)	(4) NAICS CODE			
(5) STREET ADDRESS	(6) CITY	(7) COUNTY			
(8) MAILING ADDRESS	(9) CITY	(10) ZIP CODE			
(11) CONTACT NAME		(12) CONTACT PHONE			
(13) TYPE OF BUSINESS, OPERATION, or ACTIVITY					

(14) SB 14 reportable total quantities of Hazardous Waste Generated at Site, for 1998 and 2002 Reporting Years.

Reportable Total Quantities include all hazardous wastes subject to SB 14.

Do not include nonroutinely generated, exempted, or secondary wastes. Exempted and nonroutinely generated wastes are listed in Section 67100.2(c), Title 22, California Code of Regulations. Secondary waste is hazardous waste generated as a result of onsite treatment of HAZARDOUS waste.

Obtain information requested below from your 1998 and 2002 Plans or Compliance Checklists.		1998	2002
(15) SB 14 hazardous waste processed onsite in a wastewater pretreatment unit for discharge to POTW or NPDES permit			
(Category A*)	Total:	lbs	lbs
(16) All other SB 14 hazardous waste (Category B*)	Total:	lbs	lbs
(17) All extremely hazardous waste	Total:	lbs	lbs

^{*} Category A was previously referred to as aqueous waste. Category B was previously referred to as nonaqueous waste.

(18) COMMENTS regarding hazardous waste source reduction and recycling activities (add page if needed).					

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By 2006: (Add page if needed.)

in the 2002 Plan?

Estimate when this source reduction measure will be implemented:

What is the annual projected source reduction quantity identified

month

year

pounds per year

TABLE 2: SPECIFIC WASTE STREAM INFORMATION DATE

Complete and submit a separate Table 2 for each major hazardous waste stream.

Complete and submit a separate Table 2 for each minor hazardous waste stream for which a source reduction measure was selected.

IDENTIFICATION		
(19) NAME OF GENERATOR, FACILITY, or BUSINESS	(20) EPA ID NO.	
(21) HAZARDOUS WASTE STREAM DESCRIPTION	(22) CALIFORNIA WASTE CODE	<u> </u>
	CWC	
(23) THIS HAZARDOUS WASTE IS (please check one):		
Processed onsite in a wastewater pretreatment unit for discharge	ge to POTW or NPDES permit (Car	tegory A)
Other SB 14 hazardous waste (Category B)		
Extremely hazardous waste		
ACCOMPLISHMEN Your 1998 SB 14 Plan, Performance Report, or Compliance Checklis		
(24) Provide the following information for this waste stream:	t, nao uno mormanom	
How much waste was generated in the 1998 Reporting Year?		pounds
Describe the source reduction measure(s) implemented since 1998 (add page if needed):		
Estimate when this source reduction measure was implemented:	Month	year
For this measure, what source reduction quantity was projected in the 1998 Plan:		pounds per year
Estimate the quantity of waste reduced annually by this measure since implementation:		pounds per year
(See Summary Progress Report publication or SB 14 Guidance Manual Cha	apter 6, to help estimate hazardous w	vaste reduced.)
PROJECTIONS Your 2002 SB 14 Plan or Compliance Checklist hasthis information.		
(25) Provide the following information for this waste stream:		
How much waste was generated in the 2002 Reporting Year?		pounds
Describe the source reduction measure selected to be implemented		

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